

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN DIVISION**

UNITED STATES OF AMERICA, Plaintiff, vs. JOSH HARRY ISLER, Defendant.	No. 18-CR-2032-LRR DEFENDANT’S SENTENCING MEMORANDUM
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COMES NOW the Defendant, Josh Harry Isler, by and through his undersigned attorney, and in support of his Sentencing Memorandum states to the Court as follows:

I. WITNESSES

The Defendant does not anticipate having any witnesses testify at sentencing.

II. EXHIBITS

Defendant will file by a separate document, Defendant’s Sentencing Exhibits.

III. SENTENCING ISSUES

Defendant has no objection to the current Criminal History Category of I and the current Advisory Guideline Range of 0 months to 6 months. See, P.S.I.R ¶ 176.

However, it is the Defendant’s understanding that the Government will file a Motion for Upward Departure and/or Motion for Upward Variance based upon the concepts of actual loss and/or intended loss.

Defendant will file a Resistance to any Motion for Upward Departure and/or Upward Variance, if filed by the Government, within 7 days after the Motion is served. See, L.Cr.R. 47.

CERTIFICATE OF SERVICE

I hereby certify that on January 8, 2019, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

Assistant U.S. Attorney Rich Murphy



/s/ Alfred E. Willett

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ATTORNEY FOR DEFENDANT,

JOSH HARRY ISLER

Copies to: Senior U.S. Probation Officer Angie Myhlhousen
Josh Isler